

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>Petitioner,</b>	)	
	)	
<b>V.</b>	)	<b>CIVIL NO. SA-21-CV-186</b>
	)	
<b>\$236,400.00, MORE OR LESS IN</b>	)	
<b>UNITED STATES CURRENCY</b>	)	
	)	
<b>Respondent.</b>	)	

**VERIFIED COMPLAINT FOR FORFEITURE**

Comes now Petitioner United States of America, by and through the United States Attorney for the Western District of Texas and the undersigned Assistant United States Attorney, pursuant to Rule G, Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, Fed. R. Civ. P., and respectfully states as follows:

**I.  
NATURE OF THIS ACTION**

This action is brought by the United States of America seeking forfeiture to the United States of the following property:

**\$236,400.00, More or Less in United States Currency,**

hereinafter the "Respondent Currency."

**II.  
JURISDICTION AND VENUE**

Under Title 28 U.S.C. § 1345, this Court has jurisdiction over an action commenced by the United States, and under Title 28 U.S.C. § 1355(a), jurisdiction over an action for forfeiture. This Court has *in rem* jurisdiction over the Respondent Currency under Title 28 U.S.C. §§1355(b) and 1395. Venue is proper in this district pursuant to Title 28 U.S.C. § 1355(b)(1) because the acts

or omissions giving rise to the forfeiture occurred in this district, and pursuant to Title 28 U.S.C. §§ 1355(b)(1)(B) and 1395(b) because the Respondent Currency is found in this district.

### **III. STATUTORY BASIS FOR FORFEITURE**

This is a civil forfeiture action *in rem* brought against the Respondent Currency for violations of Title 18 U.S.C. §§ 1341 and 1957 and subject to forfeiture to the United States of America pursuant to Title 18 U.S.C. § 981(a)(1)(C), which states (with emphasis added):

**§ 981. Civil forfeiture**

(a)(1) The following property is subject to forfeiture to the United States:

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(C) Any property, real or personal, which constitutes or is derived from proceeds traceable to . . . any offense constituting “*specified unlawful activity*” (as defined in section 1956(c)(7) of this title . . . .

Violations of Title 18 U.S.C. § 1341, Mail Fraud, are offenses constituting “specified unlawful activity” as defined in Title 18 U.S.C. § 1956(c)(7).

↓

**§ 1957. Engaging in monetary transactions in property derived from specified unlawful activity**

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(f) As used in this section—

\*\*\*

(3) the term “*specified unlawful activity*” and “*proceeds*” shall have the meaning given those terms in section 1956 of this title

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**§ 1956. Laundering of monetary instruments**

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(c) As used in this section—

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(7) the term “*specified unlawful activity*” means—

(A) any act or activity constituting an offense listed in section 1961(1) of this title . . . .

↓

**§ 1961. Definitions**

As used in this chapter—

- (1) “racketeering activity” means . . . (B) any act which is indictable under any of the following provisions of *title 18, United States Code*: . . . section *1341 (relating to mail fraud)* . . . .

**IV.**  
**FACTS IN SUPPORT OF VIOLATION**

See Appendix “A” for facts under Seal.

**V.**  
**PRAYER**

WHEREFORE, Petitioner, United States of America, prays that due process issue to enforce the forfeiture of the Respondent Currency, that due notice pursuant to Rule G(4) be given to all interested parties to appear and show cause why forfeiture should not be decreed,<sup>1</sup> and in accordance with Rule G of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, Fed. R. Civ. P., that the Respondent Currency be forfeited to the United States of America, that the Respondent Currency be disposed of in accordance with the law and for any such further relief as this Honorable Court deems just and proper.

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<sup>1</sup> Appendix B, Notice of Complaint of Forfeiture, which is being filed along with this Complaint, will be sent to those know to the United States to have an interest in the Respondent Currency.

Respectfully submitted,

ASHLEY C. HOFF  
United States Attorney

By:  \_\_\_\_\_

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**VERIFICATION**


Senior Special Agent Jason Bollen, declares and says that:

1. I am a Special Agent with the United States Secret Service, assigned to the San Antonio Field Office, and I am the investigator responsible for the accuracy of the information provided in this litigation.

2. I have read the above Verified Complaint for Forfeiture and know: the contents thereof; the information contained in the Verified Complaint for Forfeiture has been furnished by official government sources; and the allegations contained in the Verified Complaint for Forfeiture are true based on information and belief.

Pursuant to Title 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this the 24 day of February, 2021.

  
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Jason Bollen, Senior Special Agent  
United States Secret Service  
San Antonio Field Office